

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BERNARD ROSS HANSEN, and
DIANE RENEE ERDMANN,

Defendants.

Case No. CR 18-0092-RAJ

**DECLARATION OF ANGELO J.
CALFO IN SUPPORT OF
DEFENDANT HANSEN'S
OPPOSITION TO GOVERNMENT'S
MOTION IN LIMINE TO EXCLUDE
CERTAIN EVIDENCE RELATED TO
NORTHWEST TERRITORIAL MINT
BANKRUPTCY**

I, Angelo J. Calfo, declare as follows:

1. I am an attorney with Calfo Eakes LLP and represent Bernard Ross Hansen in the above-captioned case. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter dated July 3, 2019 from AUSA Brian Werner to defense counsel disclosing expert witnesses the government may call during trial.

DECLARATION OF ANGELO J. CALFO IN SUPPORT
OF HANSEN'S OPPOSITION TO GOVERNMENT'S
MIL TO EXCLUDE CERTAIN EVIDENCE
(Case No. CR 18-0092-RAJ) - 1

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1 3. Attached hereto as **Exhibit 2** is a true and correct copy of an excerpt from an FD-
2 302 memo of an interview of Mark Calvert on April 21, 2016, produced at Bates number
3 FBI_000036.

4 4. According to the government's discovery, Hansen resigned from his role at NWTM
5 on April 12, 2016, the day after Calvert took control of NWTM as Trustee.

6 5. Attached hereto as **Exhibit 3** is a true and correct copy of an email dated April 12,
7 2016 from Ross Hansen to Mark Calvert re Change of locks and combos in Dayton, produced at
8 Bates number NWTM_001953/HANSEN000859.

9 6. Attached hereto as **Exhibit 4** is a true and correct copy of an email from Bill Atalla
10 with a message from Mark Calvert to the NWTM Staff distribution group re Great News of Good
11 Friday!!, produced at Bates number CHS_000186-187.

12 7. Attached hereto as **Exhibit 5** is a true and correct copy of the Fourth Supplemental
13 Reply Declaration of Mark Calvert in Support of Fee Applications of Chapter 11 Trustee and
14 Trustee's Professionals, Doc. 2063, Bankruptcy Case No. 16-11767-CMA, filed on March 25,
15 2019.

16 8. According to the government's discovery, Calvert provided the FBI with over
17 14,000 pages of documents as Trustee. Based on documents the government has produced, Calvert
18 emailed with FBI agents more than 250 times between April 2016 and June 2019, and spoke with
19 the FBI no fewer than 13 times between April 2016 and August 2019.

20 9. Attached hereto as **Exhibit 6** is a true and correct copy of an email dated June 30,
21 2016 from Mr. Calvert to FBI Agents Williamson and Bozzelli re Ross Hansen Cell Phone Log,
22 produced at Bates number TRUSTEE_006792.

23 10. Attached hereto as **Exhibit 7** is a true and correct copy of an email string dated
24 August 12, 2016 from Mr. Calvert to FBI Agent Williamson, cc Dave Huffman re John Rickey
25 Email CD, produced at Bates number TRUSTEE_0007341-7342.

1 11. Attached hereto as **Exhibit 8** is a true and correct copy of an email string dated
2 April 26, 2017 from Mr. Calvert to Erin Robinson, cc Paul Wagner and FBI Agent Williamson re
3 Hal Lindsey, produced at Bates number TRUSTEE_007777.

4 12. Attached hereto as **Exhibit 9** is a true and correct copy of an email dated September
5 29, 2017 from Mr. Calvert to FBI Agent Williamson, cc Mike Gearin re FBI Request Sept 2017,
6 produced at Bates number TRUSTEE_008810.

7 13. Attached hereto as **Exhibit 10** is a true and correct copy of an email dated May 5,
8 2016 from Mr. Calvert to FBI Agent Williamson re Attorney Client Privilege, produced at Bates
9 number TRUSTEE_006784.

10 14. Attached hereto as **Exhibit 11** is a true and correct copy of an email dated
11 December 13, 2016 from Mr. Calvert to FBI Agents Williamson and Bozzelli, cc Mr. Gearin, Mr.
12 Neu re Searching for Documents on Storage, produced at Bates number TRUSTEE_007657-58.

13 15. Attached hereto as **Exhibit 12** is a true and correct copy of an email dated
14 December 21, 2016 from Mr. Calvert to FBI Agents Williamson and Bozzelli re CH Resignation,
15 with attachment, produced at Bates number TRUSTEE_007666-67.

16 16. Attached hereto as **Exhibit 13** is a true and correct copy of an email dated April 18,
17 2016 from Mr. Calvert to FBI Agent Williamson re Customer order completed by Ross, produced
18 at Bates number TRUSTEE_006691.

19 17. Attached hereto as **Exhibit 14** is a true and correct copy of an email string dated
20 April 21, 2016 from Mr. Calvert to FBI Agent Williamson re Notice of Criminal Actions with
21 regards [sic] to Northwest Territorial Mint, produced at Bates number TRUSTEE_006719-20.

22 18. Attached hereto as **Exhibit 15** is a true and correct copy of an email string dated
23 April 21, 2016 from Mr. Calvert to FBI Agent Williamson re Notice of Criminal Actions with
24 regards [sic] to Northwest Territorial Mint, produced at Bates number TRUSTEE_006721-22.

1 19. Attached hereto as **Exhibit 16** is a true and correct copy of an email string dated
2 April 29, 2016 from Mr. Calvert to FBI Agent Williamson re Pawn shop, produced at Bates
3 number TRUSTEE_006674-76.

4 20. Attached hereto as **Exhibit 17** is a true and correct copy of an email dated January
5 12, 2017 from Mr. Calvert to FBI Agents Bozzelli and Williamson re documentation of Hal
6 Lindsay, with attachments, produced at Bates number FBI302_007365-68.

7 21. Attached hereto as **Exhibit 18** is a true and correct copy of an FD-302 memo
8 regarding a meeting on April 14, 2017 with FBI Agents Williamson and Bozzelli, AUSA Werner,
9 and Cascade Capital Group (CCG) representatives Mr. Calvert, Jessica Gilmore, and Mr. Calvert's
10 attorney, Mike Gearin, produced at Bates number FBI_000004.

11 22. Attached hereto as **Exhibit 19** is a true and correct copy of an email string dated
12 May 2, 2016 from Mr. Calvert to FBI Agent Williamson re Criminal Action, produced at Bates
13 number TRUSTEE_006798-99.

14 23. Attached hereto as **Exhibit 20** is a true and correct copy of excerpts from
15 presentation slides titled "Northwest Territorial Mint LLC, Case No. 16-11767 CMA, Initial
16 Customer and Creditor Meeting, May 11, 2016, 1:30 PM," produced at Bates number
17 TRUSTEE_006436-76.

18 24. Attached hereto as **Exhibit 21** is a true and correct copy of an email string from
19 FBI Agent Bozzelli to AUSA Werner re Ross / Settlement, produced at Bates number
20 TRUSTEE_007257-59.

21 25. Attached hereto as **Exhibit 22** is a true and correct copy of an email string dated
22 October 17, 2016 from Mr. Calvert to FBI Agent Williamson re Help please!, produced at Bates
23 number TRUSTEE_007227.

